

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	NO: 6:24-CV-00138
	§	
\$79,685.00 IN UNITED STATES	§	
CURRENCY	§	
Defendant.	§	

VERIFIED COMPLAINT FOR FORFEITURE IN REM

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

Nature of the Action

1. This is an action to forfeit property to the United States for violations of 18 U.S.C. §§ 1343, 1349, 1956, and 1957.

Defendant In Rem

2. The Defendant Property is \$79,685.00 seized from Bank of America account XXXXXXXX91341 on or about January 18, 2024, in Tyler, Texas. The Defendant Property is currently in the custody of the United States Secret Service.

Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is personal property involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957, or any property traceable to such property, and pursuant to 18 U.S.C. § 981(a)(1)(C) because it is personal property which constitutes or is derived from proceeds traceable to a violation of any offense constituting a specified unlawful activity (as defined in 18 U.S.C. § 1956(c)(7)), namely, a violation of 18 U.S.C. § 1343, or a conspiracy to commit such offense (18 U.S.C. § 1349).

Facts

7. The facts and circumstances supporting the forfeiture of the above-described property are attached in the affidavit by Special Agent Daniel Leung.

Potential Claimants

8. The known potential claimant to the Defendant Property is:

Chi-Mao Chiang
9650 Telstar Ave., Unit A 274
El Monte, California 91731

Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States and order any other relief that the Court deems appropriate.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ Robert Austin Wells
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VERIFICATION PURSUANT TO 28 U.S.C. § 1746

I, Daniel Leung, hereby state that:

1. I am a Special Agent with the United States Secret Service.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.

DANIEL P LEUNG Digitally signed by DANIEL P
LEUNG
Date: 2024.04.12 19:03:32 -05'00'

Daniel Leung
Special Agent
United States Secret Service

Dated: _____